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May 19, 2021

**Via ECF**

Hon. Ronnie Abrams  
United States District Judge  
United States District Court for the Southern District of New York  
40 Foley Square, Room 2203  
New York, NY 10007

Re: ***Gran Sabana Corporation N.V. v. Mitchell H. Kossoff***, Case No.  
**1:21-cv-03154-RA**

Dear Judge Abrams:

On behalf of Plaintiff Gran Sabana Corporation N.V. ("Gran Sabana"), we write to provide the Court with a status update in the above-referenced action.

Plaintiff Gran Sabana initiated this action on Monday, April 12, 2021 and filed an Order to Show Cause in connection with that action against Defendant Mitchell H. Kossoff ("Kossoff"). See ECF Nos. 1-8. Gran Sabana served Kossoff on April 12, 2021. See ECF No. 10. Pursuant to Fed. R. Civ. P. 12(a)(1)(A)(i), Kossoff's time to answer or otherwise respond to the Complaint expired on May 3, 2021.

On May 12, 2021, Notices of Appearance were entered in this case by Mr. Christopher D. Skoczen and Mr. Aaron Barham of Furman Kornfeld & Brennan LLP, who have appeared on behalf of Kossoff. See ECF Nos. 15, 16. Counsel for Gran Sabana contacted Kossoff's counsel and Mr. Barham advised that Kossoff requests an extension to Answer the Complaint by June 30, 2021. Gran Sabana does not object to the request.

The parties anticipate having further discussions to consider a resolution of this action and will advise the Court to the extent the parties are able to propose a path forward for this matter.

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Respectfully submitted,

*/s/ Carolina A. Fornos*  
Carolina A. Fornos  
Partner

cc: All counsel of record via ECF